

**From:** VGilbert@SunAmerica.com  
**Sent:** Thursday, December 16, 2004 2:45 PM  
**To:** NIEHS ICCVAM  
**Subject:** no more animal testing!

Dear Dr. Stokes,

Despite its mandate to promote the acceptance of alternatives to cruel and outdated animal tests, the U.S. Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) seems bound and determined to do just the opposite. ICCVAM's on four well-established alternatives to the notorious Draize rabbit eye-irritation test is the latest example of this.

**I want to see the U.S. become the world leader--rather than the weakest link--in the move away from animal testing.**

\* ICCVAM should follow the example set by European countries that accept the results of these *in vitro* methods, alone or in combination, to classify severely irritating and corrosive chemicals, and should eliminate proposals for "confirmatory" testing on animals.

\* ICCVAM's background-review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over- and under-prediction rate. ICCVAM should not presume to "validate" a non-animal method against an animal test that has never been properly validated itself.

\* ICCVAM should take the time to learn that these tests are being used safely and effectively by the industry today.

\* ICCVAM should accept and use of non-animal test methods in the U.S.

and please **CONSIDER BEING A LEADER IN THE MARCH TOWARD A MORE COMPASSIONATE WORLD!**

**Thank you, and happy holidays.**

**Valerie Gilbert**

**NYC**